

November 30, 2005

Robert Johnson, Regional Director
US Bureau of Reclamation
Lower Colorado Region (Attn: BCOO-1000)
PO Box 61470
Boulder City, NV 89006-1470

Dear Mr. Johnson,

In response to the September 30, 2005 notice in the Federal Register (70 FR 57322), the City of Mesa, Arizona ("Mesa"), submits these comments regarding management strategies for Lake Powell and Lake Mead under low reservoir conditions, including Lower Basin shortage guidelines.

Mesa, the third-largest city in Arizona, holds subcontracts for 36,388 acre-feet of municipal and industrial priority Central Arizona Project (CAP) water and for a percentage of the available supply of non-Indian agricultural priority CAP water, historically equal to at least 10,000 acre-feet per year. In addition Mesa has interest in Indian priority CAP water through both leases and exchanges that total nearly 25,000 acre-feet. CAP water supplies make up nearly 45% of the water provided to Mesa customers. Because the CAP is the junior diverter in the lower basin, the management strategies being developed by the Bureau are of critical interest and importance to our citizens. Mesa asks the Bureau to give particular weight to its comments as CAP water users potentially bear the greatest burdens of shortage on the Colorado River.

To that end, please note that Mesa and other Arizona water users have developed a set of concepts that we believe must be addressed in the final management strategy. We ask that the scope of the EIS be sufficiently broad to include the following concepts:

1. Operation of Lakes Powell and Mead must be consistent with the Law of the River, including and in particular the legal requirement that operation for the generation of hydropower is subordinate to operation for water supply purposes. Water users should

not be subject to an increase in the frequency or duration of shortages for the benefit of hydropower production.

2. The minimum objective release from Lake Powell to the Lower Basin must be at least 8.23 maf/yr. Lower Basin shortage guidelines should expire no later than 2016, with an opportunity for review and revision preceding the expiration date.
3. Any change in Upper Basin deliveries arising out of consultation with the seven basin states regarding conjunctive management of Lakes Powell and Mead must be consistent with the Upper Basin's delivery obligations to the Lower Basin and the Upper Basin's share of the Mexican obligation. If conjunctive management of Lakes Powell and Mead is the implemented strategy, then the time frame for this management strategy may need to be extended beyond 2016, with the opportunity for review and revision preceding the expiration date.

Through a public process established by the Arizona Department of Water Resources the affected Colorado River water users in Arizona have tentatively agreed that the Bureau should evaluate the following Lower Basin shortage volumes. Shortages to the Lower Basin water users in Arizona should be based on water level elevations at Lake Mead as follows:

400,000 af shortage at or below 1075 ft at Lake Mead
500,000 af shortage at or below 1050 ft at Lake Mead
600,000 af shortage below 1025 ft at Lake Mead

The final shortage guidelines must be flexible enough so that, after consultation by the Secretary of the Interior (Secretary) with the affected Arizona water users, any necessary reductions beyond 600,000 acre-feet are accomplished in the least damaging way. The guidelines also should contemplate that improved hydrologic conditions may warrant a lesser shortage volume than indicated by the Lake Mead water level elevation.

4. The management of shortages within Arizona between those Priority 4 water users located along the Colorado River mainstem and those dependent on the CAP was also considered through the Arizona water users' stakeholder process. Mesa believes that the Secretary must apportion shortages among Priority 4 water users in a manner consistent with the language of the Priority 4 contracts and the Law of the River.
5. The affected Arizona water users will determine how to most efficiently manage shortages within Arizona.

6. Operation of the Yuma Desalting Plant must be considered in such a manner as to not increase Lower Basin shortages either with respect to severity, magnitude, duration or frequency of occurrence.
7. Mexico and Nevada should share in any Lower Basin shortage.
8. Finally, the Secretary should implement the final management strategy through a record of decision after completion of the environmental impact statement by the Bureau.

Thank you for the opportunity to comment on this critical issue. Mesa looks forward to working with the State of Arizona and the Bureau as the process for determination of shortage criteria and reservoir management schemes continues.

Sincerely,

A handwritten signature in cursive script, reading "Kathryn Sorensen".

Kathryn Sorensen
Water Resources Coordinator

Cc: Herb Guenther, Director, Arizona Department of Water Resources